



UNC  
GREENSBORO

# Compliance and Integrity Program

UNCG Board of Trustees | Compliance, Audit, Risk and Legal Committee  
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# Overview

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- I. Compliance Programs in Higher Education
- II. UNCG Compliance Program
- III. Elements of an Effective Compliance Program
- IV. Next Steps

# Compliance Programs in Higher Education

# Compliance in Higher Education

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- Compliance is not new; always managed compliance obligations
- However, external rules, regulations, and policies have increased in recent years

# Compliance Programs in Higher Education

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- Historically, compliance has been decentralized (silos)
- A compliance program provides assurance to the University governance and management structures that compliance obligations are being managed and monitored
- Assists University leaders in fulfilling their fiduciary responsibilities

# UNCG Compliance and Integrity Program

# Overarching Goals

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- To create a culture in which compliance and ethical decision making are second nature
- “Create awareness by people that they need to be in compliance and the expectation is that they will be in compliance.”

<http://agb.org/trusteeship/2013/7/welcome-compliance-u-boards-role-regulatory-era>

# What is the UNCG Compliance and Integrity Program (“CIP”)?

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## The CIP is

- An initiative to promote awareness, provide support, and conduct monitoring of the University's compliance with laws, regulations, and policies

## The CIP is NOT

- An enforcement mechanism
- A barrier to strategic initiatives
- Responsible for handling internal investigations or internal audits



# What is the CIP? (continued)

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A commitment to operating ethically, with integrity, and in compliance with all applicable laws, regulations, and policies in furtherance of our mission for the benefit of the students and community we serve.

# Purpose of the CIP

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- Identify compliance risks that impact the University.
- Understand the nature of compliance risks and ensure measures are in place to proactively mitigate them
- Foster a culture of integrity and compliance that is central to all the institution's operations and activities.
- Provide a resource to those charged with day-to-day compliance activities.

# Guidelines

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- Federal Guidelines for Building and Evaluating Compliance Programs
  - 2015 Chapter 8 – Sentencing of Organizations U.S. Sentencing Commission Guidelines
  - Evaluation of Corporate Compliance Programs, U.S. Department of Justice, Criminal Division
- International Organization for Standardization, ISO 19600 Compliance Management Systems Guidelines

# Elements of an Effective Compliance Program

# Elements of an Effective Compliance Program, Summarized

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- Oversight by high-level personnel
- Due care in delegating substantial discretionary authority
- Effective communication to all levels of employees
- Reasonable steps to achieve compliance, which include systems for monitoring, auditing, and reporting suspected wrongdoing without fear of reprisal
- Consistent enforcement of compliance standards including disciplinary mechanisms
- Reasonable steps to respond to and prevent further similar offenses upon detection of a violation

# Elements of the CIP

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- Culture
- Oversight
- Risk assessment
- Written policies and procedures, including disciplinary guidelines
- Monitoring, reporting, and response
- Prevention through training and education
- Communication
- Continuous improvement

# Tentative Work Plan 2019-20

Months	Activities
September-December 2019	<ul style="list-style-type: none"><li><input type="checkbox"/> Define program structure and first-year CIP work plan</li><li><input type="checkbox"/> Identify and meet with Compliance Partners to conduct initial compliance risk inventory</li><li><input type="checkbox"/> Enhance University Policy Manual website</li></ul>
January-March 2020	<ul style="list-style-type: none"><li><input type="checkbox"/> Develop compliance matrix</li><li><input type="checkbox"/> Enhance University Compliance website</li></ul>
April – August 2020	<ul style="list-style-type: none"><li><input type="checkbox"/> Prepare compliance risk assessment criteria and process</li><li><input type="checkbox"/> Training sessions with Compliance Partners on compliance risk assessment criteria and process</li></ul>
Fall 2020	<ul style="list-style-type: none"><li><input type="checkbox"/> Review 2019-20 CIP work plan and develop work plan for 2020-21</li><li><input type="checkbox"/> Conduct compliance risk assessment</li></ul>



**UNC GREENSBORO**

# Thank you

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